

Comment on RM 9267

Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington D.C. 20554

I have just downloaded and read the Land Mobile Communications Council (LMCC) petition. As I read the petition it will reallocate 420-430MHz and 440-450MHz (herein referred to as 70cm) to the Private Mobile Radio Service (PMRS).

I believe the LMCC proposal to be UNSOUND and provides undue burden on the Amateur Radio Service. The Amateur service was primary on this band until the 1950s when patriotic amateurs agreed to accept secondary status due to pressing national security needs of the U.S. Military.

The LMCC would like to displace the amateur community with a "for profit" service at the expense of the public service. If this happens emergency and severe weather services provided "free of charge" to the public by generous radio amateurs will suffer. If the Military no longer needs these important bands then the primary allocation should be returned to the Amateur Radio Service.

Acceptance of the LMCC petition will have the following negative consequences:

1. Radio Amateur Civil Emergency Service (RACES) and the Amateur Radio Emergency Service (ARES) groups will not be able to support municipal fire and police agencies during communication emergencies in urban areas adequately without the 70cm band. In my RACES organization in Garland, Texas the Garland Office of Emergency Services depends on these frequencies. We run net voice traffic on the 2 meter band (144 to 148Mhz) and Medical and Logistics traffic on separate 70cm frequencies.
2. SkyWarn (Weather Spotters trained by the National Weather Service) groups will lose over half of their available frequencies and many valuable repeaters thus depriving the National Weather Service of key "on the ground" assets provided "Free of Charge" to the public by the Amateur Radio Service.
3. Over half of the popular UHF frequencies will be lost reducing the practice and experimentation which has made the Amateur Radio Service one of the premier backup radio services. No other civilian service can boast of the readiness and ability to operate under extreme adverse conditions provided by Amateur Radio.
4. Amateurs routinely utilize the 70cm band under controlled net conditions. Net operation is a skill which is only developed and maintained by practice, training and discipline. PMRS users do not practice under net conditions and would not be equipped to support disaster and relief efforts.

- 5 PMRS users typically do not provide for "off grid operation" which is required during emergencies while Amateurs routinely have this capability. Allocating these frequencies to PMRS will, in essence, deprive the public of the benefit of controlled net operations.
6. Millions of dollars of amateur repeater and radio equipment will be rendered useless imposing a severe financial burden upon people who cheerfully volunteer this same equipment for use to support many public service and health & welfare events. I see no discussion in RMC 9267 to compensate the amateur community in this "For Profit" scheme.
7. Mobile amateurs routinely use 70cm frequencies to save lives and property as they go about their daily business. Loss of these frequencies will severely limit this ability in urban areas.
- 8 The packet radio data system in Texas (Tex-Net) currently uses 70cm for its high speed "backbone" communications. This is used extensively to pass National Traffic System (NTS) messages. In the case of the Wichita Falls, Texas tornado, Over 20,000 Health, Safety and Welfare messages were passed over this system in a period of less than a week , "Free of Charge" to the public by the Amateur Radio Service.
9. The petition was very quick to point out two or three individual examples of how they could provide health and welfare communications (such as Section 1, Item 16). Can they point to 20,000 examples? If this petition is acted upon you will effectively destroy a service that works and works well at no charge to the public. The amateur radio community is made up of individuals who volunteer their time to train, volunteer their time to operate and volunteer their equipment in most any emergency or natural disaster

I would like to close by saying that the Amateur Radio Service is making the most efficient use of spectrum of any service. The amateur radio technical specification on voice modulation at this point it is 2500 hertz of deviation per channel. Commercial radio at this point is allowed 5000 hertz of deviation per channel.

I would suggest that prior to the LMCC acquiring additional spectrum, it should instead concentrate on efficiently utilizing the existing spectrum it already has. This by it self would double their available channels.

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